# UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.

v.

00 - 105L

THE PALESTINIAN AUTHORITY, et al.

### PLAINTIFFS' FURTHER MOTION TO ENLARGE

Plaintiffs hereby move the Court to enlarge the period of time in which to file their response to defendants' Motion for Stay Pending Appeal. Plaintiffs request an enlargement until September 9, 2004.

Plaintiffs' motion is accompanied by the attached memorandum.

Plaintiffs, by their Attorney,

David J. Strachman #4404 McIntyre, Tate, Lynch & Holt 321 South Main Street, Suite 400 Providence, RI 02903 (401) 351-7700 (401) 331-6095 (fax)



### **CERTIFICATION**

I hereby certify that on the \_\_\_\_\_ day of September, 2004 I faxed and mailed a true copy of the within motion along with memorandum to:

Ramsey Clark Lawrence W. Schilling 36 East 12<sup>th</sup> Street New York, NY 10003 (fax 212-979-1583)

Deming E. Sherman Annemarie M. Carney EDWARDS & ANGELL, LLP 2800 Bank Boston Plaza Providence, RI 02903 (fax 401-276-6611)

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#### MEMORANDUM IN SUPPORT OF PLAINTIFFS' FURTHER MOTION TO ENLARGE

Plaintiffs respectfully request that the Court enlarge until September 9, 2004 the period in which to respond to defendants' Motion for Stay Pending Appeal.

Defendants filed their motion, but not accompanying memorandum, on July 23, 2004. They simultaneously filed a Motion to Exceed Page Limit. On July 29, 2004, defendants filed an Amended Motion to Stay Pending Appeal, without an accompanying memorandum. Defendants filed their memorandum in support of their motion to stay with exhibits on August 10, 2004 and it arrived at plaintiffs' office only on August 11, 2004. Consequently, plaintiffs' response was due August 30, 2004. Plaintiffs moved to enlarge their response period until September 3, 2004. On September 7, 2004, the clerk faxed notice that the motion was granted by rule of court.

As a result of vacation and court appearances, counsel is in need of additional time to prepare a response to defendants' motion and requests leave until September 9, 2004 to file their

<sup>&</sup>lt;sup>1</sup> Defendants did provide an unsigned draft of their memorandum without exhibits earlier.

response memorandum. Said memorandum is being filed simultaneously with the filing of this motion.

Plaintiffs, by their Attorney,

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